

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

ALEX WOMACK and AMY WOMACK,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No. 3:19-cv-937
	)	
KYAMRAN MAKHARADZE;	)	
MERIX EXPEDITED SERVICES, LLC;	)	
GREAT LAKES TRANSPORT SOLUTION, LLC; and	)	
GILSTER-MARY LEE CORPORATION,	)	
	)	
Defendants.	)	

**DEFENDANT GREAT LAKES TRANSPORT SOLUTION, LLC'S**  
**NOTICE OF REMOVAL**

NOW COMES Defendant, GREAT LAKES TRANSPORT SOLUTION, LLC, and pursuant to 28 U.S.C. §§ 1332(a), 1441, and 1446, and hereby removes this action to the United States District Court for the Southern District of Illinois. In support of this Notice, GREAT LAKES TRANSPORT SOLUTION, LLC states as follows:

1. On July 25, 2019, Plaintiffs, Alex Womack and Amy Womack, filed their Complaint against the above Defendants in the Third Judicial Circuit Court, Madison County, State of Illinois, seeking damages for personal injuries allegedly arising from an motor vehicle accident. See **Exhibit 1**.

**Jurisdiction**

2. This Court possesses subject matter jurisdiction over this action because the matter presents a dispute between citizens of different states, and the amount in controversy is greater than \$75,000.00. See 28 U.S.C. § 1332(a).

3. There is complete diversity of citizenship between the relevant parties.
  - (a) Plaintiffs, ALEX WOMACK and AMY WOMACK, are citizens of Madison County, Illinois.
  - (b) Defendant, GREAT LAKES TRANSPORT SOLUTION, LLC, is a New York Limited Liability Company with its principal place of business located in Amherst, New York.
  - (c) Defendant, GILSTER-MARY LEE CORPORATION, is a Missouri Corporation and is fraudulently joined to this litigation.
  - (d) Defendant, KYAMRAN MAKHARADZE, is a citizen of Missouri.
  - (e) Defendant, MERIX EXPEDITED SERVICES, LLC, is a Missouri Limited Company with its principal place of business located in St. Louis, Missouri.
4. The amount in controversy exceeds \$75,000.00. The Plaintiffs' Complaint seeks an amount in excess of \$75,000.00, thus this Court possesses subject matter jurisdiction over this action. 28 U.S.C. § 1332(A).

#### **Timeliness of Removal**

5. GREAT LAKES TRANSPORT SOLUTION, LLC accordingly files this Notice within 30 days of service of the Complaint. *See* Ex. 1. Accordingly, this Notice of Removal is timely brought before this Court. *See* 28 U.S.C. § 1446(b).

#### **Venue and Other Matters**

7. Because this action was originally filed in Madison County, Illinois, the action is properly removable to the United States District Court for the Southern District of Illinois. *See* 28 U.S.C. § 1441(a); 28 U.S.C. § 92(a)(1).

8. A copy of this Notice of Removal is being contemporaneously filed herewith with the Circuit Court of Madison County, State of Illinois, instructing that no further proceedings shall be had until such time as this matter is remanded from this Court.

9. True and correct copies of all pleadings which demonstrate that this matter is removable is attached hereto as Ex. 1. See 28 U.S.C. § 1446(b).

10. Consents of removal from GILSTER-MARY LEE CORPORATION, KYAMRAN MAKHARADZE, and MERIX EXPEDITED SERVICES, LLC are attached as **Exhibit 2**.

WHEREFORE, Defendant, GREAT LAKES TRANSPORT SOLUTION, LLC, requests that this Court assume full jurisdiction over the cause herein as provided by law, and that further proceedings in the Madison County Circuit Court regarding the action be stayed. GREAT LAKES TRANSPORT SOLUTION, LLC further respectfully demands that the trial of this matter in Federal Court be heard by a jury.

GREAT LAKES TRANSPORT SOLUTION, LLC, Defendant

/s/ **Douglas R. Heise**

BY: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this **28th** day of **August, 2019**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

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***/s/ Douglas R. Heise***

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